| 1  | WEITZ & LUXENBERG, PC<br>Aaron Freedman*  |                                |
|----|---|--------------------------------|
| 2  | James J. Bilsborrow* 700 Broadway   |                                |
| 3  | New York, NY 10003<br>Telephone: (212) 558-5500   |                                |
| 4  | afreedman@weitzlux.com  |                                |
| 5  | jbilsborrow@weitzlux.com  |                                |
| 6  | Counsel for Plaintiffs  |                                |
| 7  |   |                                |
| 8  | UNITED STATES DISTRICT COURT<br>NORTHERN DISTRICT OF CALIFORNIA                                 |                                |
| 9  | RACHELLE COLVIN, individually and as next friend of minor Plaintiff, G.D.,                      | Case No. 3:23-cv-04146-VC      |
| 10 | DANIELLE SASS, individually and as next   | [Proposed] Order Re: Discovery |
| 11 | friend of minor plaintiff, L.C., DAVID L. GENTRY, individually and as next friend of            | DISPUTE                        |
| 12 | minor plaintiff, L.G., OSMANY   | Judge: Hon. Robert M. Illman   |
| 13 | RODRIGUEZ, individually, and as next friend of minor plaintiff, O.R., JOSHUA R.                 | Judge. Hom. Robert W. Hillian  |
| 14 | MUNSON, individually and as next friend of  |                                |
| 15 | minor plaintiffs D.C., J.M., T.T., and R.T, and LAVINA GANN, individually and as next           |                                |
| 16 | friend of minor plaintiff, S.J., and on behalf of all others similarly situated,                |                                |
| 17 | Plaintiffs,   |                                |
| 18 | v.  |                                |
| 19 | ROBLOX CORPORATION, SATOZUKI  |                                |
| 20 | LIMITED B.V., STUDS ENTERTAINMENT LTD., and RBLXWILD ENTERTAINMENT                              |                                |
| 21 | LLC,  |                                |
| 22 | Defendants.   |                                |
| 23 |   |                                |
| 24 | PROPOSED ORDER  |                                |
|    | PURSUANT TO STIPULATION, in accordance with this Court's rulings at the September               |                                |
| 25 | 17, 2024 hearing, (ECF No. 105), on the discovery disputes regarding Plaintiffs' First Set of   |                                |
| 26 | Requests for Production (the "Requests") to Defendant Roblox Corporation ("Roblox"), and as set |                                |
| 27 | ` <b>,</b> ,  |                                |
| 28 |   | [Proposen] Oppen Dr. Discoveny |

[PROPOSED] ORDER RE: DISCOVERY
DISPUTE
No. 3:23-CV-04146-VC

1 forth in the parties' joint letter brief, (ECF No. 103), the Court hereby **ORDERS**: 2 1. Subject to any further order of the Court or any stipulation between the 3 parties that a different period will apply to specific discovery requests, the 4 Relevant Time Period for discovery shall begin on January 1, 2018. 5 2. In response to Request for Production No. 61 in Plaintiffs' Requests, Roblox 6 shall search for and produce all documents related to Roblox's use of third-7 party organizations to review the Roblox platform in order to evaluate its 8 safety and appropriateness for child and teen users, including all 9 organizations referenced in the Our Partners section of the Safety and 10 Civility at Roblox Help Center article<sup>1</sup> and/or that which a parent can use 11 when deciding whether a platform is safe for their kids, except to the extent 12 that such documents solely relate, and were and/or are exclusively related to 13 child sexual abuse material ("CSAM"), sexual exploitation, grooming, 14 terrorism content, hate speech and/or bullying. 15 IT IS SO ORDERED. 16 17 Dated: September 24, 2024 18 Hon Robert M. Illman United States Magistrate Judge 19 20 21 22 23 24 25 26 <sup>1</sup> See https://en.help.roblox.com/hc/en-us/articles/4407444339348-Safety-Civility-at-Roblox (last visited September 21, 2024). 27 28

[PROPOSED] ORDER RE: DISCOVERY
DISPUTE
CASE No. 3:23-CV-04146-VC

**CIVIL LOCAL RULE 7-12 STIPULATION** The above and foregoing proposed Order regarding the Relevant Time Period of discovery and Plaintiffs' Request for Production No. 61 is endorsed by the parties, through their undersigned counsel, as evidenced by the e-signatures below, dated September 23, 2024: /s/ Aaron Freedman Aaron Freedman Attorney for Plaintiffs \_/s/ Tiana Demas\_ Tiana Demas Attorney for the Defendant Roblox